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dba FREMONT & 9<sup>TH</sup> APARTMENTS

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SETH SCHORR,

Plaintiff,

v.

WOLFF PRINCIPAL HOLDINGS, LP dba  
FREMONT & 9<sup>th</sup> APARTMENTS;  
SCHEINDLER ELEVATOR  
CORPORATION; DOES I through X; and  
ROE BUSINESS ENTITIES I through X,  
inclusive,

Defendants.

and related cross-claims

**CASE NO.: 2:22-CV-01806-MMD-MDC**

**JOINT STIPULATION AND ORDER TO  
EXTEND DEADLINES FOR  
DEFENDANTS' INITIAL EXPERT  
DISCLOSURES AND REBUTTAL EXPERT  
DISCLOSURES**

IT IS STIPULATED AND AGREED, by and between Plaintiff Seth Schorr, by and through his attorney of record, Nia Killebrew, Esq. of Richard Harris Law Harris Law Firm; Defendant Wolff Principal Holdings, LP d/b/a Fremont & 9<sup>th</sup> Apartments, by and through its attorney of record, David S. Lee, Esq. of Lee, Landrum & Ingle, and Defendant Schindler Elevator Corporation, by and through its attorney of record, Jay J. Schuttert of Evans Fears Schuttert McNulty Mickus that the deadlines for Defendants' Initial Expert Disclosure and Rebuttal Expert Disclosures be extended one week from their current due dates.

The parties have been working diligently to complete discovery in this case. The parties are currently in the process of disclosing expert witnesses. Plaintiff served his initial expert disclosure on July 29, 2024. The Defendants' initial expert disclosures were due to be served on August 26, 2024. Rebuttal Expert disclosures are due on September 24, 2024.

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Defendant Wolff Principal Holdings LP d/b/a Fremont & 9<sup>th</sup> Apartments (“Wolff”) is seeking a one-week extension to serve its initial expert disclosure, seeking a new disclosure date of September 3, 2024. Defendant Schindler Elevator Corporation (“Schindler”) agrees to Defendant Wolff’s request for a one-week extension, if the same extension is provided to Schindler. Plaintiff has agreed to the one-week extension of time for both Defendants to serve their initial expert disclosures, in exchange for a one-week extension of time to serve Rebuttal Expert Disclosures. The new, agreed upon due date for Rebuttal Expert Disclosures will be October 1, 2024. Defendants Wolff and Schindler agree to the extension of time for Rebuttal Expert Disclosures and the new disclosure date.

# **I. PROPOSED REVISED DISCLOSURE DATES**

The parties hereby stipulate to extend the following two (2) disclosure deadlines and propose the following amendments to the current discovery deadlines:

	<b>Old Deadline</b>	<b>New Deadline</b>
Defendant’s initial expert disclosures:	August 26, 2024	September 3, 2024
Rebuttal expert disclosures:	September 24, 2024	October 1, 2024
No trial date has been set.		

## **SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:**

Dated: August 26, 2024.

**EVANS FEARS SCHUTTERT  
MCNULTY MICKUS**

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Holdings, LP dba Fremont & 9<sup>th</sup> Apartments*

**ORDER**

**IT IS SO ORDERED.** Based upon the foregoing stipulation, the request to extend the following two (2) disclosure deadlines is granted as follows:

	<b>Old Deadline</b>	<b>New Deadline</b>
Defendant's initial expert disclosures:	August 26, 2024	September 3, 2024
Rebuttal expert disclosures:	September 24, 2024	October 1, 2024

  
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Hon. Maximiliano D. Couvillier III  
UNITED STATES MAGISTRATE JUDGE  
DATED: 8/27/24  
Case No. 2:22-cv-01806-MMD-MDC

Respectfully submitted by:

**LEE, LANDRUM & INGLE**

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